

# EXHIBIT 1



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December 8, 2014

Tamany Vinson Bentz

**VIA ELECTRONIC MAIL**

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Ryan Schultz  
Robins, Kaplan, Miller & Ciresi L.L.P.  
800 LaSalle Avenue  
2800 LaSalle Plaza  
Minneapolis, MN 55402-2015

Re: *Skky, Inc. v. Manwin USA, Inc. and Manwin Holdings, S.á.r.l.*, No. 13-2086 (PJS/HB)

Dear Ryan:

We write in response to your correspondence dated December 5, 2014 and November 20, 2014. As a preliminary matter, Counsel for Defendant Manwin did not respond earlier to Plaintiff's correspondence dated November 20, 2014 because it was discussing these issues with its client.

First, Skky incorrectly accuses Manwin of not producing documents relating to "Amazon EC2" services. Manwin has not and will not be producing additional documents related to "Amazon EC2" because Manwin tested but never used Amazon's EC2 service. To the extent this requires supplementation of our interrogatory response to number three, Manwin will provide Skky with a supplement.

Second, your correspondence identifies other third-party services provided by Level3Communications, LLC and AdultCentro. We are looking into this issue with our client and should have a response to you shortly.

Third, your correspondence identifies additional documents related to Manwin tube sites. Specifically, Plaintiff alleges that documents and Wiki pages concerning "Encoder Server Info," "iOS Mobile Encoding," "Limelight CDN info," "CDN Streaming," and "Bandwidth Usage Monitor" appear to be missing. Manwin has produced all documents from the relevant Wiki files and links to these documents, to the extent that these documents are non-privileged and within Manwin's possession and control.

Last, your correspondence mentions alleged deficiencies with our November 6, 2014 production. Skky's issues regarding MAN00014183 and MAN00014219 appear to be moot, as Manwin has revolved these deficiencies and has subsequently reproduced these documents in its November 24, 2014 production as MAN00014963-65 and MAN00014966-67. We are looking into the new issues you identified with respect to MAN00014201, MAN00014189, and MAN00008427.



Ryan M. Schultz  
December 8, 2014  
Page 2

Best regards,

*Tamany Vinson Bentz*

Tamany Vinson Bentz

Cc: Justi Miller